

**REMARKS**

The Non-final Office Action, mailed July 17, 2007, considered claims 1-35 and 68. Claims 1-35 and 68 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement, in that the claims contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. Specifically, the recitation of "the parser/translator enabled to interpret markup language data in native format . . . and XML-based markup" is not supported, where the markup language is not XML-based or XML-derived, given that "based" has a very wide interpretation.

Claims 1-35 and 68 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention.

Claims 1 and 68 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Beda et al., U.S. Patent Pub. No. 2003/0076329 (filed Jun. 27, 2002) (hereinafter Beda), in view of Lewallen, U.S. Patent No. 6,675,230 (filed Aug. 22, 2000) (hereinafter Lewallen), which incorporates Scalable Vector Graphics, Adobe SVG View Download Area, Copyright 2006 Adobe Systems Incorporated (hereinafter SVG).

Claims 2-27 and 30-35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Beda, Lewallen, and SVG, and further in view of Steel, U.S. Patent Pub. No. 2004/0110490 (filed Mar. 21, 2002) (hereinafter Steele).

Claims 28-29 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Beda, Lewallen, and SVG, and further in view of Kim et al., U.S. Patent Pub. No. 2003/0120823 (filed Apr. 29, 2002) (hereinafter Kim).<sup>1</sup>

By this response, claim 1 amended such that claims 1-35 and 68 remain pending. Claims 1 and 68 are independent claims which remain at issue. Support for the amendments may be found within Specification pp. 19-53.<sup>2</sup>

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<sup>1</sup> Although the prior art status of the cited art is not being challenged at this time, Applicants reserve the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

As reflected in the claims, embodiments of the present invention are directed generally toward a media integration layer including an application programming interface (API) and an object model allows program code developers to interface in a consistent manner with a scene graph data structure in order to output graphics.

Claim 1 recites, for instance, in combination with all the elements of the claim, a method for arranging vector graphics data for processing into an output. The method includes receiving a function call via an application programming interface (API) of a media integration layer (MIL). The MIL comprises a plurality of types of objects including a plurality of VisualManager objects, each VisualManager object connecting a Visual Tree to a particular medium, each VisualManager object having a relationship with a window in which graphic data is output, and each VisualManager managing the rendering process to the particular medium. The method includes interpreting the function call. The method includes a VisualManager connecting a Visual Tree to a render target which is a particular medium, where the Visual Tree comprises a plurality of Visuals and each Visual provides parent visual access, child visual collection, clipping, opacity, blendmode, transform, hit testing, and bounding box services. The method includes causing data in a scene graph data structure to be modified, traversing the Visual Tree, and rendering, by a VisualRenderer, the Visual Tree to the particular medium. Finally, the method also includes causing a change in a graphics display of the particular medium in response to the modification of data in the scene graph.

Claim 68 recites a computer program product embodiment of the method of claim 1.

Independent Claims 1 and 68 were rejected under both 35 U.S.C. § 112 and also under 35 U.S.C. § 103 as being unpatentable in view of Beda and Lewallen. The independent claims have now been amended to more particularly point out the present invention. In view of the amendments, the Applicants submit that Beda and Lewallen, both separately and in combination, fail to teach or suggest each and every element of the invention as now claimed. Further, the Applicants submit that the current amendments have obviated the rejections made under 35 U.S.C. § 112.

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<sup>2</sup> However, it should be noted that the present invention and claims as recited take support from the entire Specification. As such, no particular part of the Specification should be considered separately from the entirety of the Specification.

In particular, as to the § 103 rejection, the cited art fails to teach or suggest an receiving a function call through an API providing access to functionality of a media integration layer which comprises a plurality of types of objects including a plurality of VisualManager objects, each VisualManager object connecting a Visual Tree to a particular medium, each VisualManager object having a relationship with a window in which graphic data is output, and each VisualManager managing the rendering process to the particular medium. Notably, although Beda was cited for teaching a "display manager object," Beda fails to teach or suggest a plurality of VisualManager objects each connecting a Visual Tree to a particular medium.

The cited art also fails to teach or suggest a VisualManager connecting a Visual Tree to a render target which is a particular medium, the Visual Tree comprising a plurality of Visuals, and each Visual providing parent visual access, child visual collection, clipping, opacity, blendmode, transform, hit testing, and bounding box services. The cited art also fails to teach or suggest rendering, by a VisualRenderer, the Visual Tree to the particular medium and causing a change in a graphics display of the particular medium in response to the modification of data in the scene graph.

Because the cited art fails to teach each and every element of the invention as now recited in claim 1, a rejection under 35 U.S.C. § 103 would be improper and should be withdrawn. Accordingly, the Applicants respectfully request favorable reconsideration of claim 1 as it is now recited.

As claim 68 is a computer program product embodiment of the method recited in claim 1, the above discussion applies also to claim 68. Correspondingly, because the cited art fails to teach each and every element of the invention as now recited in claim 68, a rejection under 35 U.S.C. § 103 would be improper and should be withdrawn. Accordingly, the Applicants respectfully request favorable reconsideration of claim 68.

In view of the foregoing, Applicants respectfully submit that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time.<sup>3</sup> It will be appreciated, however, that this should not be construed as Applicants acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicants reserve the right to

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<sup>3</sup> Each of the remaining claims is a dependent claim which, as dependent upon an independent claim presumably now in condition for allowance, should also be in condition for allowance.

challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicants specifically request that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 17<sup>th</sup> day of October, 2007.

Respectfully submitted,



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